



U.S. Department of Justice

MEMO ENDORSED

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

February 26, 2019

Via ECF

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
United State Courthouse  
40 Foley Square, Courtroom 1306  
New York, New York 10007

USDC SDNY  
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Re: *United States v. Ali Sadr Hashemi Nejad, 18 Cr. 224 (ALC)*

Dear Judge Carter:

On February 25, 2019, the defendant filed nine separate pretrial motions. (*See* Dkt. Nos. 81-98). The legal memoranda in support of those motions total approximately 140 pages. The Government's current deadline to file an opposition is March 25, 2019. Given the breadth of the defendant's pretrial motions, the Government respectfully requests until April 26, 2019 to file its opposition. The Government also respectfully requests permission to file an omnibus brief in opposition totaling up to 140 pages. The Government will endeavor to be concise in its opposition and not reach its proposed 140-page limit.

The Government has conferred with defense counsel who does not object to these requests. If the Court grants the Government's request to extend its deadline to file an opposition brief, the parties respectfully request that the defendant's deadline to file any reply be set for May 17, 2019.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

by: /s/  
Andrew DeFilippis / Rebekah Donaleski  
Matthew Laroche  
Assistant United States Attorneys  
Garrett Lynch  
Special Assistant United States Attorney

The application is ☒ granted.

~~denied~~

Andrew L. Carter Jr, U.S.D.J.

Dated: March 14, 2019

NY, New York

CC: Defense Counsel (via ECF)